

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HARMONY GOLD U.S.A., INC.,

Plaintiff(s),

vs.

HAREBRAINED SCHEMES LLC,
HAREBRAINED HOLDINGS, INC.,
JORDAN WEISMAN, PIRANHA
GAMES INC., INMEDIARES
PRODUCTIONS, LLC, and DOES 1-10,

Defendants.

Case No. 2:17-cv-00327-TSZ

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
CASE DEADLINES**

STIPULATION

Plaintiff Harmony Gold U.S.A., Inc. (“Harmony Gold”) and Defendants Harebrained Schemes LLC, Harebrained Holdings, Inc., Jordan Weisman, and Piranha Games Inc. (“Defendants”) (collectively, the “Parties”), by and through their undersigned counsel, respectfully submit the following stipulation:

On May 12, 2017, the Court issued a Minute Order Setting Trial Date and Related Dates in this action (Dkt. 35);

1 On June 28, 2017, the clerk issued an Order of Default against Defendant InMediaRes
2 Productions, LLC for failing to timely plead or otherwise defend in this action (Dkt. 42);

3 Plaintiff Harmony Gold changed counsel in October 2017 (Dkt. 46);

4 On November 13, 2017, Defendant Piranha Games Inc. filed a Motion for Summary
5 Judgment (Dkt. 47), which was joined by Defendants Harebrained Schemes LLC, Harebrained
6 Holdings, Inc. and Jordan Weisman (Dkt. 54) which is currently pending before the Court;

7 On November 22, 2017, Plaintiff Harmony Gold filed a Motion for Leave to Amend
8 Amended Complaint (Dkt. 51), which is currently pending before the Court;

9 The Parties wish to defer further discovery until April 2, 2018, to avoid incurring fees
10 and expenses that may be wasted depending upon the outcome of the pending motions; and

11 For the above reasons, and to secure the just, speedy, and inexpensive determination of
12 this action, the Parties agree that it is for the mutual benefit of all of the Parties to continue the
13 current case deadlines in this action. The Parties do not anticipate the need for any further
14 extensions of these deadlines, and they will be prepared to proceed with the case pursuant to the
15 schedule set forth below.

16 THE PARTIES STIPULATE, through their respective counsel, and jointly move the
17 Court, to extend the following deadlines:

18 Deadline to file motions related to discovery: July 16, 2018

19 Fact discovery cut-off: September 3, 2018

20 Disclosure of expert testimony and expert reports: September 3, 2018

21 Expert discovery cut-off: October 15, 2018

22 Deadline to file dispositive motions: November 1, 2018

23 Deadline to file motions in limine: January 4, 2019

24 Agreed pretrial order: January 11, 2019
25

Deadline to file trial briefs, proposed voir dire questions and jury instructions:
January 11, 2019

Pre-trial conference: January 18, 2019 at 1:30 p.m.

Jury trial date: February 1, 2019

IT IS SO STIPULATED.

DATED this 2nd day of February, 2018.

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Harebrained Holdings, Inc., and Jordan Weisman*

[PROPOSED] ORDER

The following Order is made by direction of the Court, the Honorable Thomas S. Zilly,
United States District Judge:

Pursuant to the Parties' stipulation, and having examined the records and being fully
advised in the matter, now, therefore,

IT IS HEREBY ORDERED that the following deadlines are continued as set forth
below:

Deadline to file motions related to discovery	July 16, 2018
Fact discovery cut-off	September 3, 2018
Disclosure of expert testimony and expert reports	September 3, 2018
Expert discovery cut-off	October 15, 2018
Deadline to file dispositive motions	November 1, 2018
Deadline to file motions in limine	January 4, 2019
Agreed pretrial order	January 11, 2019
Deadline to file trial briefs, proposed voir dire questions and jury instructions	January 11, 2019
Pre-trial conference	January 18, 2019 at 1:30 p.m.
Jury trial date	February 1, 2019

1 All other dates and deadlines not inconsistent with this Order, contained in the Minute
2 Order Setting Trial Date and Related Dates, docket no. 35, including the deadlines for joining
3 additional parties and amending pleadings, shall remain in full force and effect.

4 DATED this _____ day of February, 2018.

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7 THE HONORABLE THOMAS S. ZILLY
8 UNITED STATES DISTRICT COURT JUDGE
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CERTIFICATE OF SERVICE

The undersigned certifies that on February 2, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

DATED this 2nd day of February, 2018.

s/ Mary J. Klemz

Mary J. Klemz